

Mary McNamara, SBN 159859  
August Gugelmann, SBN 240544  
SWANSON & McNAMARA LLP  
300 Montgomery Street, Suite 1100  
San Francisco, California 94104  
Telephone: (415) 477-3800  
Facsimile: (415) 477-9010

Attorneys for Defendant JOSE CARLOS BATRIZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE CARLOS BATRIZ,

Defendant.

Case No. CR 06-0189 SBA (KAW)

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR IMMEDIATE RELEASE TO  
HALFWAY HOUSE**

Defendant Jose Carlos Batriz and the United States of America hereby stipulate and agree as follows:

1) On April 7, 2016, the parties made for an initial appearance on a supervised release violation, pursuant to a Form 12 filed on November 19, 2015. An appearance before Hon. Sandra B. Armstrong was set for May 11, 2016.

2) The parties agreed that it would be appropriate for Mr. Batriz to reside in a residential reentry center pending the May 11 appearance. Accordingly, Mr. Batriz waived a

1 detention hearing and was remanded into custody pending placement in a halfway house. *See*  
2 Minute Order (Docket 600).

3 3) On April 8, 2016, Judge Armstrong modified Mr. Batriz's conditions of  
4 supervised release to require him to reside in a halfway house for up to six months. *See* Docket  
5 602.

6 4) A space has now become available at the residential reentry center in San  
7 Francisco. Accordingly, the parties hereby agree that Mr. Batriz should be released from  
8 custody immediately, in order to report to GeoCare at 111 Taylor Street in San Francisco.

9 5) Undersigned counsel has conferred with probation officer Alton Dural, who has  
10 no objection to this request.

11 IT IS SO STIPULATED.

12 Dated: April 26, 2016

13 \_\_\_\_\_  
14 /s/  
15 August Gugelmann  
16 SWANSON & McNAMARA LLP  
Attorneys for JOSE BATRIZ


17 Dated: April 26, 2016

18 \_\_\_\_\_  
19 /s/  
20 Garth Hire  
21 Assistant United States Attorney

22 **~~[PROPOSED]~~ ORDER**

23 PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendant Jose Batriz shall be  
24 released from the custody of the U.S. Marshal to the halfway house forthwith.

25 Dated: 4/26/16

26   
27 Hon. Kandis A. Westmore  
28 United States Magistrate Court